

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

FILED '17 NOV 1 AM 11:50
US BANKRUPTCY MIE-DET

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Hon. Thomas J. Tucker

Case No. 13-53846

**REPLY TO THE MOTION OF THE GREAT LAKES WATER AUTHORITY
AS SUCCESSOR IN INTEREST TO THE CITY OF DETROIT WATER AND
SEWERAGE DEPARTMENT FOR ENTRY OF AN ORDER ENFORCING
THE PLAN OF ADJUSTMENT INJUNCTION AND THE BAR DATE ORDER
AGAINST THE ASSOCIATION OF MUNICIPAL ENGINEERS
AND PARTHO GHOSH**

Reply of Association of Municipal Engineers (AME) to the ‘**Motion of the Great Lakes Water Authority as successor in interest to the City of Detroit water and Sewerage department for entry of an Order enforcing the plan of Adjustment injunction and the Bar Date order against the association of Municipal Engineers and Partho Ghosh**’ is provided below:

The Unfair Labor charges (ULP) were filed against the City of Detroit not Great Lakes Water Authority (GLWA) about 7 years ago, much before the City of Detroit filed for Bankruptcy. GLWA is not a successor of the City of Detroit. GLWA is the successor of Detroit Water and Sewerage (DWSD) only.

Association of Municipal engineers (AME) filed Unfair Labor Practice (ULP) Charges C10 C-060, C10 F-144 and C11 E-111 because the cases were with Michigan Employment Relation commission (MERC) in the year 2010 much before the Bankruptcy. MERC is the only proper avenue to file the ULP charge.

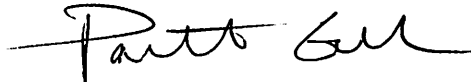
Out of three, one case is related to not providing the information by the Employer – City of Detroit to the AME Union. There was no money involved, Union was seeking information so that union could negotiate the Labor Contract.

The Two unfair labor charges are for imposing furlough and Medical Plan (Mercer plan) on AME while there was no impasse in negotiation, and the union already filed for Fact Finding. All these matters were time sensitive and should have been resolved by MERC before the Bankruptcy.

City of Detroit was aware of all the above noted MERC cases and should have listed under its liability or Debt while filing for Bankruptcy.

AME respectfully requests that this Court enter an order to deny the 'Motion of the Great Lakes Water Authority as successor in interest to the City of Detroit water and Sewerage department for entry of an Order enforcing the plan of Adjustment injunction and the Bar Date order against the association of Municipal Engineers and Partho Ghosh' and let the MERC decide the Unfair Labor Practice (ULP) charges against the City of Detroit filed in Year 2010.

Respectfully submitted:

A handwritten signature in black ink, appearing to read 'Partho Ghosh', with a stylized flourish at the end.

Partho Ghosh
President AME Union
Great Lakes Water Authority - WRRF
9300 West Jefferson, Room 420
Detroit, MI 48209
313-297-5921
Partho.Ghosh@glwater.org

Dated: October 30, 2017

cc: Kilpatrick & Associates, P.C.